

Should the Commission mandate that any individual CLEC has the right to delay by arbitration any technical interface or process change that has passed through the Change Management Process?

CLECs are demanding the incorporation of an "Interface Development Rule" ("IDR") into Ameritech Illinois' OSS future method of operation ("FMO"). The IDR would give any individual CLEC the right to block the implementation of any change to an OSS interface or process by bringing its claim to the Commission for arbitration. On its face, the proposal might seem benign. "What could be more reasonable?" one might ask. "If there is a disagreement, let the Commission decide." Yet, at its most elemental level, IDR's arbitration provision is at odds with the process approved by the Commission in Condition 29.

The CLECs claim that IDR arbitration is simply a part of the arbitration process that is already set out in Phase III of Condition 29 as articulated in the Merger Order. That is not the case. Phase II, in a collaborative process, determines what must be done. In Phase III, the results of Phase II must be implemented. Arbitration is provided in Phase III only for claims of failure to implement the requirements of Phase II, not for disputes about what should be the technical specifications of the OSS interface or process changes themselves.

The CLECs are correct in noting that Ameritech has not yet provided all specifications for changes noted in the FMO portion of the Amended POR. That is because they are not yet known. Because of that, the CLECs will no doubt claim that their proposal merely continues indefinitely the Phase II collaborative construct (complete with dispute-ending arbitration) for those future changes. The flaw in such a claim, however, is two-fold. First, Condition 29 simply doesn't not provide for this additional pre-implementation layer of arbitration after the conclusion of Phase II. The

need for quick and certain resolution militates against an automatic provision for arbitrating specification disputes.

Second, and most important, IDR arbitration is in violent conflict with the Change Management Process. As discussed in connection with the CMP OIS voting issue, *supra*, the CMP itself is *the* FCC-sanctioned way for continuing the collaborative process beyond the end of Phase II to work out the details of OSS interface and process changes that can't be determined now. Moreover, although Phase II disputes are settled by arbitration, fundamental disputes in the CMP are settled in a quicker, more efficient, "collaborative" way – by a CLEC-called OIS vote. As discussed above, in its Texas 271 Order, the FCC noted with approval, the ability of a CLEC to call for such a vote under the terms of the CMP in place in Texas.³³

[T]he plan includes a process whereby competing carriers can decide whether or not to implement a new release (i.e., "go/no go" vote), and a process for identifying and resolving issues related to the change management process in a timely manner. Unresolved change management disputes could impede a carrier's ability to access the BOC's OSS, which, in turn, hampers that carrier's ability to serve its customers. It, therefore, is critically important that change management disputes are handled expeditiously. We would be hesitant to find that a BOC has an adequate change management process in place if the change management plan does not define a mechanism for change management disputes to be handled in a timely manner. (Citations omitted.)³⁴

In the CMP at issue in Illinois,³⁵ OSS interface and process changes are discussed, and if any affected CLEC believes it is necessary, it can call for a "go/no go" vote – in which Ameritech Illinois does not participate. Although the nature of the voting process itself is in dispute in this proceeding, it must be assumed that whatever CMP results from this arbitration will be, in the Commission's eyes, a reasonable collaborative process to handle OSS interface and process changes in the future. Therefore, it would completely

³³ *E.g.*, FCC Texas 271 Order at ¶¶ 112, 130.

³⁴ *Id.* at ¶ 112.

³⁵ All of the terms of that CMP have been agreed to by the CLECs with the exception of whether a quorum should be required for a vote.

gut the CMP to permit a change that has passed through the process (even one that has passed a vote) to be subject to delay at the hands of a single CLEC. If there were potential problems with the release, they surely would have been raised in the course of the CMP. A CLEC believed that Ameritech Illinois was unresponsive, a vote could be called. If the change survived that process, either unchanged or in modified form, a single "disgruntled" CLEC should not be able to stop it. The concept is undemocratic at its core – essentially a one-person veto – and subjects the CMP to the delay and uncertainty of an arbitration process – the type of delay that the FCC itself found to be contrary to the interests of the CLECs.

Especially in light of the dispute resolution mechanism available within the Change Management Process, Ameritech Illinois' position on this issue is pro-competitive and the CLECs' request for the imposition of their IDR should be denied.

Issue #13: Relaxed Customer Service Record Address Validation:

Should the Commission order Ameritech Illinois to implement its relaxed address validation rules earlier than March? Should the Commission order Ameritech Illinois to apply its relaxed address validation rules to all orders? Should the Commission to take specific steps to address an alleged conflict of address data within its databases?

The end customer address is an important part of almost every order sent by a CLEC to Ameritech Illinois. Since these orders are for services generally delivered via wireline, knowing the address to which service is to be delivered is critical. Consequently, the end customer address has been a required field for most order types.

As critical as it is to have the end customer's address accurately represented on an order, in some cases, it is a difficult piece of information for a CLEC to provide. A customer's address can be represented in a number of ways. There are a variety of ways to represent a single address, such as with or without the directional portion (the "W." part of "223 W. Main"), or by abbreviating portions of the address differently ("Av." or "Ave."). Some customers have what is known as a vanity address ("200 J.C. Penney Plaza"). In other cases, customers know their community name differently than as known by their post office or telephone company.

Ameritech Illinois supplies CLECs with multiple methods for validating the end customer address to be included on an order in order to insure orders are received by Ameritech Illinois with a correct address. For existing customers, CLECs have access to the Ameritech Illinois customer service record, which includes the customer's service address. When CLECs need to validate an address, they have access to the pre-ordering address validation function which checks the address against the Street Address Guide (SAG), which is the master address database used by Ameritech Illinois. This database is simply a listing of all valid addresses as known by Ameritech Illinois as within its service area, and is used in this one-time check of addresses before they are assigned to a customer service record. Ameritech Illinois also makes available to CLECs an electronic copy of the Street Address Guide.

Once an address is validated and made part of a service order, and the service is provisioned, that address becomes part of the service record in the customer service database. In relatively rare circumstances, existing addresses within the SAG are changed, perhaps due to the municipality renaming or renumbering a street.

Ameritech Illinois has not been able to substantiate that these changes to the SAG cause CLEC orders to reject when the end customer address from customer service

records is used on those orders. However, in response to CLEC requests, Ameritech Illinois is planning to relax its address validation requirements for the full migration orders of three specific service types (resale, CPO, and loop with number portability), and also for standalone loop and standalone number portability orders.

A migration order is an order in which an end customer is transitioned from one service provider to another service provider, such as from Ameritech retail service to a CLEC, or from one CLEC to another. In these situations, the processing of the order without having the CLEC provide an address for the end customer is made possible by Ameritech Illinois having an existing customer service record containing the address. Ameritech Illinois will implement this relaxed edit of end customer address for migration orders in March 2001.

Covad has requested that line sharing orders also be subject to the relaxed end customer address requirement. Orders for the High-Frequency Portion of the Loop (HFPL), commonly referred to as line sharing, as contrasted to orders for the migration of an existing service to a new provider, is an order for new service, albeit over an existing telephone line. Ameritech Illinois is still examining the feasibility of Covad's request.

Although Ameritech Illinois has previously suggested that this relaxed edit could be implemented more quickly, a detailed examination of the work required and the total OSS enhancement workload prevents this enhancement from being implemented sooner than March, 2001. However, to further assist CLECs in reducing the number of orders rejected for address validation errors, Ameritech Illinois implemented an enhancement to its pre-ordering address validation transaction on July 28, 2000, that will further insure that the validated address will pass all possible address edits in the ordering process.

As a result of the implementation of the relaxed address edit, CLECs will effectively not be required to provide an end customer address for most orders where

Ameritech Illinois has an end customer address as part of its existing customer service record. Additionally, the number of order rejects due to address errors should be reduced even further by the recent change to the pre-ordering address validation transaction.

Ameritech Illinois' position is thus a reasonable one and approving that position will have no detrimental impact on local competition in Illinois.

Issue #18: Flow Through:

Should the Commission order specific steps to be taken by Ameritech to increase the flow through of its service orders?

The wholesale local services industry, i.e., CLECs and ILECs, through the Ordering and Billing Forum of the Alliance for Telecommunications Industry Standards, have developed a guideline for exchanging information regarding the ordering of these local services such as unbundled loops or resale POTS lines. This guideline is referred to as the Local Services Request or LSR. Another ATIS subcommittee is responsible for the Electronic Data Interchange (EDI) version of the LSR, which is the means for sending an LSR electronically between companies. The LSR and its EDI form are very different from the format used by Ameritech Illinois' service order and billing system. S

Upon receipt of an LSR from a CLEC, Ameritech Illinois must perform edit checks. The order must be checked to insure that all necessary information is present and is formatted correctly. Ameritech Illinois must also insure that the order can be fulfilled as ordered. For example, the services requested must be available in the area for which requested, the due date specified has to be checked to insure it meets the guidelines for the type of service requested, and references to existing service are checked against the Ameritech Illinois customer service record.

Once the order passes these checks, a determination is made as to the steps required to fulfill the order. In some cases, such as the addition of a service to an existing telephone line, a single internal Ameritech Illinois service order is created in Ameritech Illinois' service order system to effect this change. In other cases, such as the replacement of existing retail POTS service with an unbundled loop and a ported telephone number, multiple service orders may have to be created to complete the required work – one order to disconnect the existing service, one to establish the unbundled loop, and one to port the telephone number. Other decision-making or work steps may be required, such as establishing a new billing account, if required.

The information provided on the CLEC's LSR is then translated into service orders in the internal language and format required by the Ameritech Illinois service order system.

This combination of checks, decisions and work steps, and translation is very similar to what happens when an Ameritech Illinois customer service representative takes an order for retail service. Although the input in that case is a spoken request for service instead of an LSR, this spoken request must be evaluated, processed and finally translated into an internal service order.

For all retail orders, this process of translation from customer request to internal service order is performed manually by the customer service representative. For wholesale orders, the editing of a received Local Service Request (LSR) and its translation into one or more internal service orders is sometimes performed wholly mechanically and sometimes with manual assistance. The term "flowthrough" is used to describe the cases where the incoming LSR is processed through to service order creation without manual assistance.

To make it possible for an order to flowthrough, Ameritech Illinois must program its ordering interface system to reproduce the knowledge and practices of its service representatives for the many different situations they encounter daily. In some cases, a routine operation performed by service representatives many times daily can be simply programmed. In other cases, an operation performed very rarely and that changes frequently may be very difficult to program. The roughly 55% flowthrough achieved to date by Ameritech makes it possible for Ameritech Illinois 850 service representatives to process the approximately 75,000 orders it receives from CLECs on a monthly basis.

Even though significant effort is required to effect additional flowthrough, flowthrough initiatives are an important part of Ameritech Illinois' OSS enhancement process. In July of this year, a major flowthrough initiative was completed. Besides immediately increasing the level of flowthrough of resale orders, it created the foundation for further future flowthrough enhancements.

Two flowthrough enhancements associated with unbundled network element ordering are scheduled for completion yet this year. The first is an enhancement to flowthrough of Combined Platform Offering, Ameritech Illinois' UNE-P product in Illinois, scheduled for October 2000. This enhancement was scheduled as a result of CLEC activity forecasts. The second, flowthrough of xDSL loop orders and orders for line-sharing (HFPL), came as a result of CLEC input during the SBC/Ameritech Advanced Services POR collaboratives, and is scheduled for December, 2000.

Ameritech Illinois has involved CLECs in discussions regarding flowthrough enhancements through Change Management meetings beginning in April, 2000. Information regarding flowthrough exceptions has been developed and distributed. Scheduled flowthrough initiatives are now included on the enhancement list that is shared

with CLECs. Release announcements are also made to CLECs in advance of the installation of these releases.

The Commission and the CLECs, through existing performance measures on order accuracy and FOC timeliness, have the means to monitor the impact of Ameritech Illinois' flowthrough enhancements and their effectiveness. Given Ameritech Illinois' obligations to the CLECs regarding order accuracy or timeliness of order confirmation, Ameritech Illinois' interests are aligned with those of the CLECs in making carefully considered flowthrough enhancements. Additionally, Ameritech Illinois has committed to creating and providing a diagnostic performance measure on total flowthrough by product for all orders received electronically.

Existing performance measures and drive for internal operational efficiencies provide sufficient incentive for Ameritech Illinois to continue its program of flowthrough improvement. Selection of flowthrough initiatives must be made based on technical feasibility, estimates of impact on both CLECs and Ameritech Illinois, and current and future order volumes affected. These same performance measures will allow the Commission, the CLECs and Ameritech Illinois to continue to monitor the effectiveness of these flowthrough improvements over time.

Issue #19: Ordering Graphical User Interface:

Should the Commission order that the (permanent) GUI be implemented by December 2 when Ameritech Illinois has agreed to provide the ordering GUI in March, and has agreed to fund a portion of the costs of a third-party interim GUI that will be available?

Should the Commission order that Ameritech provide direct access to any backend system containing loop provisioning information?

Ameritech Illinois has committed to provide both ordering and pre-ordering Graphical User Interfaces ("GUI") in March, 2001. That date is significantly earlier than what is required by Conditions 29 of the Merger Order. Phase III provides a twelve-month implementation period which only commences when the requirements have been fixed by either a written agreement or an arbitration. Ameritech Illinois' schedule cuts that timeline in half for GUI implementation.

To meet this March, 2001, commitment, very significant software programming changes are required to existing Ameritech Illinois and SBC systems on a very ambitious schedule. In the context of another OSS collaborative in Wisconsin, Ameritech was ordered by the Public Service Commission to determine whether the GUI scheduled for the March 2001 release could be accelerated. Ameritech did extensive analysis to determine whether the GUI could be deployed sooner than the March 2001 release (which requires that the interface be available for CLEC test in January, 2001). That question was escalated to the highest levels of management responsible for information technology and wholesale operations within SBC/Ameritech. On July 18, 2000, and reaffirmed today, September 1, 2000, Ameritech represented to the Public Service Commission of Wisconsin, that after extensive investigation and escalation, it is the conclusion of the responsible management that SBC/Ameritech cannot accelerate, in whole or in part, the March 2001, planned deployment of the permanent GUI. The same representation is made to this Commission. Discussed below are the reasons an accelerated deployment is not feasible, an analysis that shows this slight delay will have a minimal impact on competitive entry, and a proposed "interim" GUI offer that is available to carriers until the permanent GUI is deployed.

First, the effort required of SBC/Ameritech to enhance the existing Graphical User Interface, LEX, for use in Illinois is significant and is dependent on numerous other

“back-end” system modifications. Therefore, the deployment of LEX requires more than just taking this existing interface and “plugging it in” in Illinois. Moreover, the existing application is being reengineered to be accessible using a Web browser rather than through SBC-provided software as it is currently. In addition, new screens must be developed to support the ordering of products that are currently ordered electronically in Illinois, but have not previously been ordered via GUI in other SBC regions. Once new screens are developed, information must be developed and loaded into the system regarding the proper format and acceptable values for the data to be entered in the many new fields on these screens.

“Behind” the GUI, work must be done to create the connecting software, referred to as middleware, that provides the connectivity, the rules, and the translation functions that link the GUI to Ameritech Illinois’ ordering interface system. Essentially, this middleware formats orders entered through the GUI into a format acceptable to the ordering interface system so that these GUI-entered orders appear as if they had been received via EDI. The middleware must also be programmed to make the same transformation in reverse for information, such as Firm Order Confirmations (“FOCs”) and Order Completions, sent from Ameritech Illinois to the CLEC GUI user.

This enhanced GUI software must be subjected to testing by Ameritech Illinois software engineers before deployment. User documentation and training must be developed. The hardware, the actual computers, that this new GUI software and middleware will use have to be purchased, installed, and tested. This level of effort required prevents the implementation of these Graphical User Interfaces prior to the March, 2001 release, which will actually be available to CLECs for testing in January.

However, the slight delay in the availability of these GUIs cannot reasonably be considered to have a significant impact on the competitive marketplace in Illinois based on the extensive use of other electronic interfaces.

For example, in the first three months of 2000, Ameritech received an average of 77,000 resale orders monthly and an average 82% of them were received over Ameritech's Electronic Data Interchange (EDI) interface. Ameritech also received an average of 39,000 unbundling orders monthly of which an average of 91% of them were received electronically (40% were received via EDI and 51% were received via an ASR).

After excluding CLECs that submit less than 4 orders per day (less than 100 per month), 72% (38 of 53) of CLECs utilized the Ameritech EDI interface to submit 85% of their orders.

For CLECs that do not want to develop their own interfaces, there are commercially available alternatives. For example, Telcordia's Exchange Link products enables CLECs to interface with Ameritech Illinois' pre-ordering EDI interfaces using Exchange Link's Graphical User Interface. Exchange Link is currently in production use by Sprint, and Telcordia is in contract negotiations with eight other CLECs in the Ameritech region. Since Exchange link also provides access to other ILECs' preordering and ordering interfaces, the CLECs would have the added benefit of being able to use the same Graphical User Interface to perform pre-ordering and ordering functions for all the ILECs that Exchange Link has interfaces with.

Mantiss' CLECware is another commercially available product that provides the user with a Graphical User Interface that interfaces with Ameritech Illinois' EDI pre-ordering and ordering interfaces. Mantiss provides CLECware as either a service bureau or as an integrated software solution. As a service bureau, Mantiss maintains the OSS Interconnection infrastructure with the ILECs. CLECs such as WorldCom access

CLECware over the Internet to access both pre-ordering and ordering functionality. Using CLECware as an integrated software solution, CLECs such as Focal actually integrate CLECware into their OSS environment.

Finally, as another option for CLECs that are not using their own electronic interfaces or a third party provider service bureau, Ameritech has offered to make an interim GUI service arrangement available on the same terms and conditions included in a negotiated agreement arising out of the Wisconsin OSS collaboratives in PSC Docket 6720-TI-160. In that proceeding Ameritech offered and then was ordered to “work with CLECs to provide GUI service arrangement(s) for unbundled loops (with or without LNP), resale and UNE-P, through a third-party provider, during the interim period beginning on October 1, 2000” and to “pay all, or some portion of, the charges applicable to the GUI service arrangement(s)”. Ameritech voluntarily extended this same offer to participants of the Illinois OSS merger condition collaborative. Ameritech has recently enhanced its original offer (to Illinois collaborative participants as well) so that it is easy for a CLEC to utilize this third-party service without charge – simply by providing a forecast and staying within it. Ameritech received forecasts from AT&T, Birch, Covad, McLeod, Mpower, Northpoint, TDS Metrocom, Time Warner and Worldcom. These forecast included all Ameritech states these CLEC operate or plan to operate in, including of course, the state of Illinois.

In summary, if the Commission orders acceleration of the GUI, it will be requiring Ameritech to do something which appears impossible before the March 2001 planned release date. And as noted above, this date is early in the twelve month implementation phase called for in Condition 29. On the other hand, if the Commission refuses to order acceleration of the GUI, the competitive impact in the Illinois market would be virtually non-existent. The great majority of CLECs operating in the Ameritech

region and specifically in Illinois have already developed the capability to exchange information with Ameritech Illinois via EDI and without requiring a Graphical User Interface capability. Of those CLECs, the majority of their order activity, approximately 85%, is transmitted via their EDI interface. Finally, a voluntary offer has been made by Ameritech Illinois to facilitate the interim use of an existing third-party product until its own Graphical User Interfaces can be completed.

Direct Access to Backend Systems

The CLECs ask that the POR be amended to include the provisions of the Commission's recent Order in the Covad/Rhythms arbitration³⁶ which deal with direct access to loop qualifying information. First, obviously on its face, the decision applies to what terms must be included in the interconnection agreements of the two CLECs in question under the provisions of the Federal Telecommunications Act. Ameritech Illinois will be asking for rehearing and, therefore, is reluctant to voluntarily expand the scope of the decision.

Second, throughout the collaborative process, more particularly in the context of the federal Advanced Services POR, SBC/Ameritech has agreed provide the loop qualifying information found by the FCC to be important to CLECs in the provision of advanced services.³⁷ Specifically, Ameritech Illinois will provide well over 30 data-information elements to achieve OSS functionality for the provisioning of line sharing.

To provide CLECs with nondiscriminatory access to its OSS functions, Ameritech Illinois has designed and deployed "gateways" or "electronic data interfaces" that provide CLECs a single entry point for pre-ordering, ordering, provisioning,

³⁶ Arbitration decision, Dockets 00-0312, 00-0313, Dated August 17, 2000.

³⁷ See discussion, *infra*.

maintenance and repair, and billing. Gateways are necessary to provide OSS information in a uniform and useable format to multiple CLECs who want to provision line sharing across several states. By using a single gateway, CLECs can access the various OSS functions that are needed to provide adequate and efficient local service to their particular end users. These 30+ data elements are currently available in the Graphical User Interface (GUI) of Ameritech Illinois' TCNET website and through an electronic data interface. By March 2001, the same data elements will be accessible through a new GUI (Verigate) requested by the CLECs. On the other hand, because the backend systems are in many cases vintage systems that have evolved over decades, the information stored in them would, in native form, be in various cryptic formats that would be difficult to decipher.

Third, Ameritech Illinois is very concerned that allowing a CLEC to have direct access into backend databases containing customer information (even read-only access) will provide it with the opportunity to data mine information of other customers – even information of their own competitors – and, in some cases, information that could pose a security risk to end users. Consider the Loop Facility Assignment and Control System ("LFACS"). The data available through direct access to LFACS includes, but is not limited to all pending service orders. This is not simply the service orders of the inquiring CLEC, but also the pending service orders of all competitive CLECs as well as Ameritech Illinois' retail and wholesale service orders. Each service order contains the following information:

- Directory Listing Information
- Service and Equipment Information
- Billing Information
- Service Order Remarks Information

These information sections include the following:
Customer name and address

Customer telephone numbers (regardless if they are published, non-listed or non-published numbers)

Additional customer services

Customer credit information

Cable and pair assignments

Customer provided special premises access information that was made available to enable the work to be performed, i.e. the key to the gate to the back yard is under the door mat, no one is home call my sister at xxx-xxxx one hour before work is to be done, daughter will be home alone, but will let you in.

Can Be Reached (CBR) telephone numbers

Moreover, providing such access could well be a violation of Sec. 222 of the Act which prohibits a carrier from disclosing or permitting access to customer proprietary information, except under limited circumstances. Allowing a CLEC to browse a database with access to information about customers with whom it has no relationship would not seem to fall into the "in connection with the provision of the service from which it was derived" exception contained in the statute.

Fourth, such broad, unmediated, and potentially damaging access is unnecessary for competitive purposes or to fulfill either the word or the spirit of the FCC's Line Sharing Order or its UNE Remand Order.³⁸ Rather, as discussed below, the FCC obviously had the opportunity to order ILECs to permit CLECs direct access to their back office systems, but it chose not to do so. Instead, the FCC merely ordered that ILECs make available the information necessary to support OSS functions — information that Ameritech Illinois is making available through its gateways.

The FCC has stated that an ILEC must make available to CLECs the OSS functions for pre-ordering, ordering, provisioning, maintenance and repair, and billing.³⁹ It has never required ILECs to provide direct access to their "back office systems." On the contrary, the FCC has limited CLEC access to the *information* from these systems,

³⁸ *In the Matter Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, Third Report and Order, FCC 99-238 (released November 5, 1999) ("UNE Remand Order").

³⁹ *Id.* at ¶425.

and then only to the extent such information exists. As the FCC made clear in several places in the UNE Remand Order:⁴⁰

. . . the pre-ordering function includes access to loop qualification **information**. Loop qualification **information** identifies the physical attributes of the loop plant . . .

* * *

[T]he incumbent LEC must provide access to the underlying **loop qualification information** contained in its engineering records, plant records, and other back office systems . . .

* * *

the relevant inquiry is . . . whether such **information** exists anywhere within the incumbent's back office and can be accessed by any of the incumbent LEC's personnel.

Ameritech Illinois' agreement to provide the 30+ line-sharing data elements requested by the CLECs in the context of the Advanced Services POR filed with the FCC on April 3, 2000, more than satisfies the requirements of the UNE Remand Order.

Issue #42: Unsolicited 865 Transactions

Should the Commission order additional specific system reconfigurations that should be implemented by Ameritech Illinois with respect to the identification of these messages--beyond the changes that will be made in December.

As part of the interactive ordering process between CLECs and Ameritech Illinois, multiple transactions are returned by Ameritech Illinois to a CLEC in response to an order. The intent of these transactions is to both provide information regarding the status of the order as it moves through the order fulfillment process, and to communicate information developed by Ameritech as part of this process. For example, at the point an order is entered into Ameritech Illinois' service order system(s), a transaction referred to as a Firm Order Confirmation (FOC) is transmitted to the CLEC. Besides signaling that the order has reached this point in the order fulfillment process, this transaction will communicate the assigned due date as well as any necessary assigned telephone numbers, circuit IDs, or similar information.

⁴⁰ *Id.* at ¶¶426,428, 430-431(emphasis added).

During the provisioning process, in some cases, additional information may be developed that must be communicated to the CLEC. In other cases, information previously communicated to the CLEC must be changed or corrected. Or it may be necessary that the CLEC be alerted that an order has changed status. Two special cases of this type of transaction are the jeopardy notification and the service order completion notification. The jeopardy notification is a transaction used to notify the CLEC is the originally assigned due date will not be met. The service order completion notification is used to let the CLEC know that the work requested on their order is complete.

For those cases in the order fulfillment process where other information or status changes must be communicated to the CLEC, Ameritech Illinois provides electronic notification via a transaction referred to variously as an updated FOC or an unsolicited 865 (named for the ID number -- i.e., type -- of EDI transaction set used to carry this information). This transaction was developed as an alternative to telephone or fax exchange of this information. Given the desire of both CLECs and Ameritech Illinois for reducing manual data exchanges, and the increasing rather than decreasing desire for sharing status information regarding an order's progress through Ameritech's order fulfillment process, Ameritech expects that CLECs and Ameritech will mutually find additional uses for this transaction in the future. Additionally, the use of this mechanism for communicating information and status has been made part of SBC's plans for its uniform ordering interface implementation in 2001.

When a CLEC determines that it needs to change or correct an order that Ameritech Illinois has in progress, the CLEC sends a supplement to the original order. This supplement includes a version number as means of distinguishing one supplement to a given order from another supplement to the same order. Currently, the CLEC specifies on the supplement only the changes or corrections it wishes to make to the order as it

exists at that time rather than repeating the entire order. Today, approximately 15% of orders received by Ameritech Illinois are modified in progress by a CLEC supplement, and less than 2% are supplemented more than once.

Ameritech Illinois receives the supplement and incorporates the requested changes or corrections into its internal service order and sends this replacement order to all work groups and systems that received the original order. When this updating of the internal service order is completed, as it does upon completing the creation of the original service order, Ameritech Illinois sends the CLEC a confirming transaction which includes the supplement version number for which the response is intended.

As an order progresses through the provisioning process, as noted previously, it may be necessary to notify the CLEC of a change in status or a change to information associated with their order. Also as described previously, this may take the form of a jeopardy notification, a service order completion, or an "unsolicited 865". Since these transactions are a notification of a change to the order itself, they do not carry identifying information to link them back to specific CLEC transactions, but to identify the order to which they are associated. Additionally, within the notification transaction, there are details and identifying information that clearly identify the information being communicated. So, for instance, if a previously assigned telephone number must be changed, not only is the CLEC order number (known as the Purchase Order Number or PON) included, information identifying the telephone line to which the new telephone number is being assigned is also included.

Ameritech Illinois has received a CLEC request submitted through the change management process for a modification to the identifying information on the unsolicited 865. This CLEC requested that Ameritech Illinois include the version number of the most recent supplement processed for a given order in the information provided as part of

the transaction 'header', or identifying information. Ameritech Illinois will make this enhancement available in December, 2000.

In addition, as part of the Plan of Record created by SBC/Ameritech in response to the FCC Uniform and Enhanced OSS merger condition, SBC/Ameritech has agreed to a CLEC request to implement "full refresh" supplements. This "full refresh" enhancement will require CLECs to send a complete updated copy of an order each time they wish to make a change or correction to an order in progress instead of specifying only the changes/corrections. This will be implemented in September, 2001, as part of implementation of the SBC-wide uniform ordering interface.

Ameritech Illinois is providing sufficient information in its notification transactions, including the unsolicited 865, for the receiving CLEC to identify the order to which it is related, and the status or information detail being communicated.

Issue #46: Coordinated Hot Cuts

Should the Commission order specific changes to the testing process made available by Ameritech in connection with coordinating hot cuts?

In this context, a 'hot cut' is the switch of a customer from one service provider to another without taking the customer out of service. Some hot cuts are "coordinated" – i.e., with the live involvement of representatives of both service providers.

The Ameritech Coordinated Hot Cut (CHC) process was developed in a series of collaborative sessions which were conducted from May through July, 2000. The first collaborative meeting was initiated due to issues raised in Wisconsin OSS proceeding. The collaboratives produced the following major results –

- A detailed process flow for Coordinated Hot Cuts (CHC) and related processes was developed.

- Special handling of provisioning trouble reports within 24 hours of cutover.
 - Ameritech agreed to take the trouble calls in the Provisioning/Coordination Center and not the Maintenance Center. Normal/parity processes would require these call to go through the Maintenance Center. This exception processing was agreed to address a CLEC issue of minimizing customer concern that might result from their decision to change telecommunication carriers.
 - Ameritech also agreed to provide trouble ticket status updates every 4 hours or as status changed.
- Expansion of the CHC process to integrate DSL (Digital Subscriber Loop) conversions where the DSL provider was reusing Ameritech facilities, e.g., ISDN (Integrated Subscriber Digital Network), and required coordination. DSL providers will at times reuse existing Ameritech ISDN lines for providing DSL to their customers. The CHC process details steps to support this type of coordinated cut.
- On conversions which require facilities modifications, Ameritech has agreed to provide several phone notifications to CLECs to facilitate more timely use of their resources. These calls include a notification call from the Installation Technician prior to the field visit and another call once the technician is at the premises to coordinate the work effort. Prior to the CHC collaborative, the CLEC only received notification upon completion of the required facilities modification.
- No formal policy existed for restoring customers to Ameritech when the customer is out of service following the cut, i.e., a "Throwback". In this collaborative, the parties developed the "Throwback Process" allowing

customer restoral of service in an expedited fashion using a specially developed "LOA (letter of authorization) Restoral Form". This process allows the CLECs to re-establish an Ameritech retail account rather than requiring end user customers to contact the Ameritech retail center. Normal parity policy would have required the customer to contact Ameritech to authorize this transfer of their account. This new process enabled the CLEC to act as the customer's agent.

- Ameritech agreed to include residential cuts in this process.
- Ameritech enhanced the processing and scheduling of off-hour cutovers.
- Ameritech will perform "screening" of service orders two days prior to the due date (DD-2) to eliminate potential roadblocks and providing CLECs advance notification of possible conversion issues.
- Ameritech will provide positive acknowledgment of receipt of CLEC Cut Sheet by DD-1 (one day before due date), 3 p.m.
- Ameritech will hold service orders open for 2 hours after the cutover allowing CLECs time for testing.
- Enhanced the optional Dial Tone Check to include Automatic Number Identification (ANI) validation of telephone number (TN) and have validation performed at the Ameritech Main Distributing Frame (MDF) and to include ANI.

Once the process began, Ameritech agreed to make the CHC collaborative regional in scope and have the defined process apply to all Ameritech states. Meeting notices and several iterations of the proposed process flows were posted on TCNet. . The final Hot Cut process was to be approved by the collaborative team on June 28, 2000. On the June 28 conference call, AT&T stated that they were not comfortable that

all CLECs had an opportunity to review the agreed upon process flow. Ameritech agreed to postpone CHC implementation from August 15 until September 11 to allow the process to be posted once again on TCNet and provide a specific comment cycle. The collaborative participants agreed to convene after the comment cycle and a follow-up meeting was held on July 18 to ensure that any comments were addressed and to finalize the CHC process. CLECs were asked to provide comments to Ameritech no later than July 12. Only one CLEC – CoreComm – provided comments concerning “partial” ports. Those concerns were addressed through the process flows to CoreComm’s satisfaction. At the follow-up meeting on July 18, the AT&T representative stated that he had comments and issues which he had failed to provide in a timely fashion. He did raise those issues at the meeting and they were addressed to everyone’s satisfaction. The Hot Cut process was unanimously accepted and the agreed upon implementation date is September 11, 2000.

Although it has participated on every issue throughout the CHC collaborative, AT&T has expressed concern about one particular issue – automatic Dial Tone (DT)/ANI (automatic number identification) validation. Prior to the CHC collaborative, Ameritech “toned” (placed dial tone on) the wiring that was laid in place on the wiring date. On the cut date, Ameritech checked for dial tone at the CLEC CFA facility. Ameritech proceeded with the cut regardless of the status of the dial tone validation and informed the CLEC post-cut if no dial tone was present. On the optional dial tone checks requested by CLECs, Ameritech validated the presence of dial tone only at the CLEC CFA facility. As a result of this collaborative, Ameritech has significantly revised the wiring, DT/ANI validation, and cutover procedures as follows:

- Ameritech will continue to “tone” through the wiring laid in place on the wiring date. This process allows Ameritech technician to validate that the

wires laid in the central office from the CLEC CFA to the Main Distributing Frame (MDF) cable pair have continuity and are in place properly. This ensures that the Ameritech work is error-free facilitating a "fail safe" conversion.

- On the cut date, the Ameritech technician will perform not only a validation that dial tone exists but also an ANI validation to ensure that the telephone number (TN) on the facilities match the service order request. This validation will be done on both the existing Ameritech facilities and the laid in wiring from the CLEC facilities. By performing the ANI test, Ameritech validates that the CLEC has completed its provisioning work for the TN translations and are providing them on the CFA required for interconnection.
- If there is no DT or the wrong TN at the CLEC CFA, Ameritech will not proceed with the cut. This process change was done at the request of the CLECs participating in the collaborative.
- The optional DT checks are now DT/ANI checks. Ameritech will now not only validate the presence of DT at the CLEC facility but they will also validate that the CLEC has performed its provisioning work on the TN translations and are providing them on the CFA required for interconnection. This validation provides the CLEC a verification of its work and accuracy of facility assignments.

AT&T had asked that Ameritech perform DT/ANI on all CHC circuits two days prior to the due date. Ameritech stated it would do so only if all the CLECs would agree to complete their provisioning work (i.e., translations by 8 am) two days prior to the due date. With the exception of AT&T, all the CLECs participating in the collaborative stated they were unable to do so.

Ameritech did offer an alternative, which addresses AT&T's business issue/need to have DT/ANI validated DD-2. This alternative gives a CLEC the ability to submit a DT/ANI validation sheet **anytime** within its own provisioning process up to the day prior to the due date. A CLEC can have the validation done in a manner customized to its own specific provisioning process. Having this process performed at a customized level for each CLEC produces far more meaningful results for CLECs and also eliminates numerous communications on both sides. If AT&T provisions its translations DD-2, then this process provides them the flexibility to request the DT/ANI validation of its work at that time. This also addresses AT&T's concern about having the DT/ANI validation done early enough in the process to check for possible errors in its provisioning process. AT&T has also questioned the "unidentified" cost that may be associated with this process. This function is charged at normal time and material charges.

In summary, Ameritech Illinois has behaved reasonably and has made significant adjustments to accommodate CLEC concerns. None of the claims involve competitively significant matters and the Commission should refuse to entertain these back-door "wish list" tactics.

Issue #47: Hot Cuts--Desired Frame Due Time:

Should the Commission order specific changes to be made to Ameritech Illinois' procedures for handling "uncoordinated" hot cut?

Midway through the collaborative cycle AT&T also raised the issue of "FDT" (frame due time). AT&T stated a business need to have the ability to enter a proposed cut time on a CHC order and have Ameritech confirm on the Firm Order Confirmation (FOC) that resources would be available for that desired cut time and date. This has

become known as desired frame due time (DFDT). Ameritech reviewed this request and found that it would be able to support the requested functionality. However, the details and the process had not been worked out and required collaborative effort. The CHC collaborative team agreed to proceed with the Hot Cut process as defined for a September 11 implementation and continue to work the DFDT issue for a October 5 implementation. Subsequently, the CLECs requested to delay the initial meeting addressing DFDT issues (from August 18 to August 23). CLECs also have requested that the newly developed process be presented at the CLEC Change Management Forum on September 21. The new target date for implementation is October, 2000.

AT&T raised several other issues in its summary which must be addressed. First, AT&T disagrees that the hot cut process was "developed through a collaborative process". It claims that Ameritech's proposal represents Ameritech's "best offer" at the end of three months of collaboratives, but is not something the Wisconsin participants collaboratively agreed to. However, at each collaborative meeting, all CLEC participants were asked if there continued to be any issues or concerns. At times there were individual CLEC concerns that were not shared by other participants and there was no consensus reached to support these concerns (e.g., AT&T's request for automatic DT/ANI validation two days prior to the due date). The problem with this situation is that AT&T apparently believes that disagreement with its position somehow removes it from being a part of the collaborative.

Next, AT&T states that Ameritech's "best offer" to make a variation of ANI/dial tone tests available on an order by order basis "per the terms of the interconnection agreements" is insufficient. They claim that Ameritech's alternative will not provide feedback on any dial tone, translations or facility problems in a time frame which will

allow a CLEC to identify and correct errors in advance of the cutover due dates. As detailed above, however, every CLEC has the option to submit a request for DT/ANI validation whenever it is needed in its provisioning cycle. There is nothing to preclude AT&T from provisioning translations for their customers 2 or 3 days in advance of the due date and submitting a DT/ANI validation request. Validation results will be provided within the same business day if submitted by noon. If submitted after noon, results will be provided by noon the following business day.

Next, AT&T states that other aspects of Ameritech's "best offer" remain problematic. It claims Ameritech has insisted upon an expanded interval of five days compared with three days for Southwestern Bell Telephone Company to provision hot cuts. Ameritech does not believe that this issue was ever raised in the collaborative. Regardless, it was the AT&T representative that drew the diagram of required work activities that drove the agreed upon five day interval.

Further, AT&T states that Ameritech has imposed increasingly stringent obligations on the CLECs. It claims that any delays in providing a "cut sheet" to Ameritech or in the commencement the actual cutover on the due date will require the CLEC to "supplement" the order and essentially repeat the entire process. Once again, this is something that did not come up in the course of the collaborative. Initially, Ameritech asked the CLECs to submit the cut sheets by 10 am DD-1. After discussion, the collaborative agreed to noon DD-1. This provides a reasonable time frame for the CLEC to identify which service orders they plan to coordinate for conversion on the following day. It also permits Ameritech some time to ensure that all of its required resources are scheduled for the following day.

Finally, AT&T claims that any errors identified on the due date, which would have been identified via an effective dial tone/ANI test, will require CLECs to

supplement or cancel the orders. As noted, the DT/ANI validation is available. In addition, the process to stop the conversion process at time of cut was developed collaboratively.

In sum, as with coordinated hot cuts, Ameritech Illinois' actions in the collaborative process has been reasonable and CLECs' position in bringing these issues to arbitration is not. Ameritech Illinois has not behaved anticompetitively in trying to deal with these issues within the Hot Cut collaborative. Certainly no anticompetitive impact will result from not granting CLECs claims.

Issue #62: Directory Listing Ordering and Inquiry

Should the Commission order Ameritech Illinois to make directory listing ordering available over a single interface prior that involves the directory publishing company to September, 2001? Despite the disparity of systems, should the Commission order Ameritech Illinois to undertake specific steps to make directory listing inquiry available over a single interface?

Should that function include Yellow Pages section and heading information?

CLECs are requesting a process by which Ameritech Illinois will provide CLECs with directory listings information that relates to listings published for UNE Loop end users. In reality, this is a request for the development of a new functionality that links the CSR (customer service record) Inquiry process to an external directory database for listings information not available in the Ameritech Illinois CSR database. Throughout the SBC/Ameritech region, standalone UNE loops have no Directory Listings information associated with them in the telephone company CSR databases. For example, if one were to purchase a car, the dealership will relay all of your license

registration information to the Secretary of State's Office, but if you were to require a change to your registration (i.e. vanity plates), you would be required to process your request through the Secretary of State's Office directly, since the request no longer involves a relationship with the car dealership. Where the Ameritech Illinois CSR database does have Directory Listings information (e.g. UNE-P and UNE Port), Ameritech Illinois will supply all available Directory Listings information via the CSR Inquiry process. The functionality and data architecture of the AAS (Ameritech Advertising Services) directory system are vastly different from the Ameritech Illinois based preorder directory listings inquiry tool used to retrieve Ameritech Illinois CSR information containing directory listing information. Combining two different architectures and data structures into an existing pre-ordering platform that was not designed to handle AAS' functionality would require a complete re-write of both systems and interfaces.

Specifically, the CLECs are also requesting two types of functionality surrounding Directory Listing Inquiry that Ameritech Illinois does not provide to itself. First, just as CLEC service personnel cannot view Ameritech Illinois listings in captions containing Ameritech Illinois numbers, Ameritech Illinois service personnel do not have the ability to view CLEC numbers contained in a listings caption comprised of both Ameritech Illinois and CLEC listings and, therefore, must work with Ameritech Advertising Services to address specific questions. In captions with listings from multiple local service providers, each company can see only its own telephone numbers. Secondly, AT&T claims that Ameritech Illinois has designed customer service record information provided to the CLECs to exclude information about the sections of the yellow pages where business end user listings are located. Ameritech Illinois did not include this information in the customer service record (CSR) because Ameritech Illinois

does not have access to, nor does it control where Ameritech Advertising Services places any telephone customer's listings in Ameritech Advertising Services' unregulated directories. To provide these services would not only result in a significant increase in costs, but more importantly, it would eliminate the parity between Ameritech Illinois and the CLECs that Ameritech Illinois has strived to create.

For the above reasons, Ameritech Illinois believes that the existing Directory Listing inquiry processes should continue where the listing data is maintained in the Telco CSR database. For directory listing information maintained only in AAS directory systems, CLECs should continue to work directly with AAS to inquire on their listing data. Moreover, CLECs' request in this regard cannot reasonably be regarded as having significant competitive effect.

Issue #11: Retain Current Listings

Should the Commission order Ameritech Illinois to undertake specific changes necessary to make the process for retention of current listings available for partial migration.

The CLECs are requesting that Ameritech Illinois implement a process to allow CLECs the option to retain current listings on all order types, including partial migrations. A partial migration occurs when a customer migrates only a portion of lines on an account to another carrier, as opposed to a full migration, which would be a conversion of the customer's entire account (all telephone numbers). CLECs also prefer that this ordering process should support Directory orders over a single interface for all service types.

Ameritech Illinois has agreed to implement a process to allow CLECs the option to retain current "Listings As Is" on all full migration orders by March, 2001. Ameritech

Illinois has no current plans to "Assume Listings As Is" on partial migrations. The "Listings As Is" option is consistent with the processes that have been made available in the other SBC regions for full migrations (or full conversions). This was provided to assist the CLECs with conversion orders where no listing information changes and the full account was migrated as is. The CLEC carries forward the information from the previous account to the new account. This only occurs when all Telephone Numbers (TNs) under a former Master Bill Number (MBN) have a one for one match to the new MBN. Subsequently, SBC/Ameritech expanded the Directory "Listings As Is" for full migrations that involved a "Convert As Specified" (Activity Type 'V') order on the account. Again, this was only supported where a full migration occurred due to the one for one relationship between TNs from the former MBN and TNs on the new MBN. Ameritech Illinois cannot offer the Directory "Listings As Is" option on partial migrations, because there is not a one for one match between TNs going from the former MBN to the new MBN.

It is the account relationship between the primary listing and additional listings that is used to establish the structure of a listing account. As an example, a small chain of muffler shops in its existing Ameritech Illinois relationship might have unique MBNs for each shop, but all the shops are in one listing set up for the chain. In the listing set up, the shop office area listing appears first and its corresponding work area listing is indented below it. If the telephone numbers for only the work areas migrated to a CLEC, it would not be possible to automatically maintain the prior listing account structure because the work area telephone numbers would no longer be associated with the numbers for the offices of each muffler shop. Although the listing set up will look the same and retain the same directory appearance, the supporting account information necessary to maintain the work area listings must be created under a new account structure. The original office

area account structure is no longer associated with the converted telephone number(s) for the work area.

Separately, Ameritech Illinois has agreed to eliminate the need for two ordering interfaces no later than 70 weeks from completion of Collaborative Phase II for ordering as part of the common platform. Today, a CLEC places its UNE order with the Ameritech Illinois via the LSR process and a Directory Listings order directly with the AAS (Ameritech Advertising Services) directory affiliate. No later than September, 2001, a single interface will be integrated into the current EDI/LSR loop ordering processes. This will enable the CLEC to communicate its loop and directory listing order to the Ameritech Illinois, and then Ameritech Illinois, after the order passes appropriate LSR/DSR edits, will coordinate/generate the necessary directory listings transactions to the AAS affiliate.

Issue #73: UNE-P-Ordering, Billing

Should the Commission, in this proceeding, specify when Ameritech Illinois must make available the UNE platform for new customers and additional lines despite the fact that the FCC's rules have been vacated? Should the Commission order Ameritech Illinois to implement CABS billing for UNEs and UNE combinations prior to its October, 2001, commitment?

UNE-P "Ordering" – the Product Issue

The CLECs ask the Commission, in this proceeding, to determine whether Ameritech Illinois combine network elements for CLEC to serve new customers and for existing customers' second and additional lines if those elements are not an operational pre-existing combination, also known as a "new" UNE-P. The UNE-P is a combination of

network elements that includes a loop (the physical line connecting Ameritech Illinois' central office to the customer's premises), local switching, and shared transport (the interoffice facilities between Ameritech Illinois' central office). If those network elements are operational and combined, the arrangement is know as an "existing" UNE-P. Ameritech clearly has an obligation to provide existing UNE-P, but has no legal duty to provide "new" UNE-P, apart from voluntary commitments Ameritech has made, such as in the SBC/Ameritech Merger , or is willing to make in the context of Section 271 collaborative filings. The CLECs attempt to disguise this as an OSS issue and ask the Commission to require Ameritech Illinois to implement OSS to support pre-order, order, maintenance and repair, and billing for "new" UNE-P utilized to serve new customers, second and additional lines. Yet, the issue they seek to have resolved is a "statutory" issue whether Ameritech Illinois can be required to combine network elements for CLECs if not currently combined, and on what terms and conditions. This is simply not an OSS issue that is properly within the scope of this proceeding.

In Condition 29, it is clear that the Commission wanted the parties to address OSS issues related to supporting pre-ordering, ordering, provisioning, maintenance and repair, and billing for those resold services and UNEs and UNE combinations that Ameritech Illinois does provide. The limited time duration that the Commission has imposed on these proceedings is, by itself, a clear indication that the Commission did not intend that either the parties (in the context of the collaboratives) or the Commission itself (in the context of the arbitration) should get bogged down in discussions of what resold service and UNE products Ameritech Illinois should make available to CLECs and the appropriate terms and conditions of those offerings. In fact, if product issues, including the terms and conditions of Ameritech Illinois' offerings, could be brought into this proceeding, there would be virtually no limit to the issues that any party could raise.

Rather, the POR collaborative process of Condition 29 was specifically targeted at matters dealing with the five OSS functions noted above so that issues in this limited area could be resolved expeditiously. Opening the forum to other, potentially limitless substantive issues would constitute a needless impediment to expeditious resolution of the issues properly before the Commission in this proceeding.

Nevertheless, it is clear under the law that Ameritech Illinois has no obligation to provide the UNE-P for new customers or for new (second and additional) lines for existing customers. In a July 18, 2000, opinion, the United States Court of Appeals for the Eighth Circuit has made it abundantly clear, in reaffirming its earlier decision in this regard, that the unbundling requirements of the Federal Telecommunications Act do not require incumbent local exchange carriers ("ILECs") to combine network elements for requesting carriers where such elements are not already combined.⁴¹ Moreover, in the Court's view, the Supreme Court's decision to uphold Rule 315(b), which prohibits incumbent LECs from separating already combined elements, did not affect the Court's 1997 decision concerning the additional-combination rule. Specifically, the Court said, with respect to the requirements of Sec. 251(c)(3) of the Act:

It is the requesting carriers who shall "combine such elements." It is not the duty of the ILECs to "perform the functions necessary to combine unbundled network elements in any manner" as required by the FCC's [vacated] rule. (Citation omitted.) We reiterate what we said in our prior opinion: "[T]he Act does not require incumbent LECs to do all the work." (Emphasis original.)

The provision of the UNE-P to CLECs for new customers or for second or additional lines would require Ameritech Illinois to combine network elements anew. Forcing such a combination of a loop, switching, and shared transport would violate the

⁴¹ *Iowa Utilities Board v. FCC*, No. 96-3321, (July 18, 2000), ___ F.3d ___, 2000 U.S. App. LEXIS 17234 ("Iowa Utilities Board II"). In 1997, the Court had, inter alia, vacated the FCC's rules requiring ILECs to combine network elements for requesting carriers. *Iowa Utilities Board v. FCC*, 120 F.3d 753 (8th Cir. 1997) ("Iowa Utilities Board I").

plain language of the Federal Act as determined by the Eight Circuit . Thus, should the CLECs choose to raise their claim in another proceeding more appropriate to the issue, that claim should nevertheless be denied.

UNE Billing

Worldcom is requesting that Ameritech Illinois migrate its UNE-P, and other UNEs, to be billed out of CABS for the upcoming October release, some 10 months ahead of schedule. WorldCom claims that today's billing is not auditable. That is false. This billing detailed output from today's Ameritech Illinois' billing process is not an Ameritech Illinois proprietary billing standard, but is based on the Bellcore industry standard format. In response to WorldCom's other claim, not only are the bills auditable, but Ameritech Illinois also has a formal notification process for billing detailed output changes through the change notification letter process.

To further assist WorldCom with its concern for auditability, Ameritech Illinois met with WorldCom staff to discuss the ULS-ST billing requirements that WorldCom was recommending. At the meeting, WorldCom staff conceded that it was specific billing elements that WorldCom needs to be able to audit the bill and not necessarily the complete CABS system. WorldCom agreed that as long as those elements were provided their requirements would be met. Ameritech Illinois then provided to WorldCom a draft bill design "mock-up" that will be available with the October, 2000, release and asked WorldCom personnel to identify any specific data elements they feel are missing. Ameritech Illinois recently received WorldCom's comments regarding Ameritech Illinois' ULS ST bill mock-up on Wednesday August 23, 2000. Being that the

information provided is still under review, no decisions have been made as to Ameritech Illinois' ability to incorporate their request.

WorldCom's reference to the Pac Bell conversion to SWBT CABS implies that both the Pac Bell project and Ameritech project were the same. This is not the case. The work to reach Phase I in the December, 2000, release for Pac Bell actually began over 3 years ago. There have been major infrastructure changes over that time to migrate from the older Pac Bell version of CABS to the more enhanced SWBT version of CABS. The Ameritech Illinois project will not require 3 years because Ameritech Illinois does not need to migrate to the SWBT version of CABS since it is already on the same version as SWBT. Ameritech's project involves a migration from ACIS billing of ULS-ST to the Ameritech CABS system. Unlike the 3 year Pac Bell project, this Ameritech project cannot be implemented before October, 2001, due to the magnitude of the work involved in migrating from ACIS to CABS (approximately 25000 man hours for the design, development, testing, and implementation). This timeframe does not include the other merger conditions, or other mandated orders from state or federal bodies that would compete for the same resources.

Ameritech Illinois has been working to implement ULS-ST, which is a major component to provide UNE-P, to meet the Illinois merger commitment in ICC docket 98-0555 para. 28 (B) by October, 2000. Ameritech Illinois is also working to provide uniformity and billing product alignments by converting UNE-P billing to CABS by October, 2001, to be in compliance with the Illinois Plan of Record.

This matter has no competitive effect in this state. WorldCom can audit its bills and Ameritech Illinois will provide reasonable assistance in that effort. CABS changes will be in place in a little more than a year.